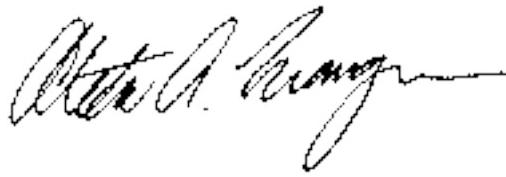


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA

vs.

Case No.: 3:15-cr-00074-1

ANGELA SUDDARTH

**ANGELA SUDDARTH'S THIRD MOTION FOR ISSUANCE OF 17(c) SUBPOENAS
AND INCORPORATED MEMROANDUM OF LAW**
(Echo Global Logistics, Inc.)

Defendant, Angela Suddarth, respectfully requests that this Court enter an order directing the issuance of a subpoena duces tecum, pursuant to Rule 17(c), Federal Rules of Criminal Procedure to the duly authorized agents of the following: Echo Global Logistics, Inc., care of its registered agent Illinois Corporation Service Company.

The list of documents sought to be produced is more fully set forth in the Schedule A's attached to this motion for the proposed subpoena duces tecum. The requested documents should be produced on or before November 24, 2015, at a place specified by this Court.

The Supreme Court articulated the test for obtaining production of documents from third parties pretrial under Rule 17(c) in *United States v. Nixon*, 418 U.S. 683 (1974). The moving party must show that: (1) the evidence sought is relevant and evidentiary; (2) the evidence is not otherwise procurable reasonably in advance of trial; (3) the party cannot properly prepare for trial without production and inspection in advance of trial, and that failure to obtain such inspection may unreasonably delay the trial; (4) the application is made in good faith and is not a fishing expedition.